

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :
:
v. : CRIMINAL NO. 11-519
:
STEPHEN ELLIS :

ORDER

AND NOW, this _____ day of _____, 2012, upon consideration of Defendant Stephen Ellis's Motion for Temporary Return of Passport and Permission to go to Aruba for a Family Vacation and the response of the United States of America, it is **ORDERED** and **DECREED** that:

1. Stephen Ellis is permitted to go to Aruba with his family from February 24, 2012 until March 9, 2012 and
2. The Clerk of Courts is to return Stephen Ellis's passport for the duration of his vacation.

BY THE COURT:

J.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 11-519
	:	
STEPHEN ELLIS	:	

**DEFENDANT STEPHEN ELLIS'S MOTION FOR TEMPORARY RETURN OF
PASSPORT AND PERMISSION TO GO TO ARUBA FOR A FAMILY VACATION**

Defendant Stephen Ellis, by and through his attorney Michael T. van der Veen, Esquire, respectfully requests this Honorable Court to grant Defendant permission to go to Aruba for a family vacation and to return Defendant's passport for the duration of the vacation and in support thereof represents the following:

1. On September 14, 2011, a federal grand jury returned an Indictment for United States v. Stephen Ellis, Criminal No. 11-519.
2. Defendant Stephen Ellis was arrested on September 29, 2011 and surrendered his passport subsequent to his arrest.
3. Defendant Stephen Ellis and Assistant United States Attorney Faithe Moore Taylor are currently in the process of resolving this case with a guilty plea.
4. Defendant Stephen Ellis and his family own a timeshare at the Marriott Resort in Palm Beach, Aruba.
5. Defendant Stephen Ellis is married with two children: Ryann Ellis who is 5 years old and Ashley Ellis who is 8 years old.
6. Defendant Stephen Ellis's timeshare period for this year runs from February 24, 2012 until March 9, 2012.

7. Defendant Stephen Ellis respectfully requests permission to go to Aruba for a family vacation from February 24, 2012 until March 9, 2012.

8. Defendant Stephen Ellis respectfully requests the return of his passport for the duration of his vacation.

9. Charles Meissler of the United States Pretrial Services does not oppose Defendant Stephen Ellis's request.

10. Assistant United States Attorney Faithe Moore Taylor does not oppose Defendant Stephen Ellis's request.

WHEREFORE, Defendant Stephen Ellis respectfully requests this Honorable Court to grant Defendant permission to go to Aruba for a family vacation and to return Defendant's passport for the duration of his vacation.

Respectfully submitted,

Michael T. van der Veen, Esquire
Attorney Identification No. 75616
Kats, van der Veen & Associates
1 Bustleton Pike
Feasterville, PA 19053
215-396-9001
Attorney for Defendant Stephen Ellis

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VERIFICATION

I, the undersigned attorney for Defendant, hereby verify that the statements made in the foregoing Motion are true and correct to the best of my knowledge, information and belief.

I understand that false statements made herein are subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Michael T. van der Veen, Esquire
Attorney Identification No. 75616
Kats, van der Veen & Associates
1 Bustleton Pike
Feasterville, PA 19053
215-396-9001
Attorney for Defendant Stephen Ellis

DATED: January 16, 2012

IN THE UNITED STATES DISTRICT COURT
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:
v. : CRIMINAL NO. 11-519
:
STEPHEN ELLIS :

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion to has filed electronically and is available for viewing and downloading from the ECF system.

Respectfully submitted,

Michael T. van der Veen, Esquire
Attorney Identification No. 75616
Kats, van der Veen & Associates
1 Bustleton Pike
Feasterville, PA 19053
215-396-9001
Attorney for Defendant Stephen Ellis

DATED: January 16, 2012